MEMO

To: Mary Selkirk, CALFED, Chair of Ecosystem Restoration Work Group

From: Robin Reynolds, CDFA
JAN.
Date: ~~June~~ 6, 1997

Subject: Comments on the CALFED program document entitled, "Preliminary Working Draft, CALFED Bay-Delta Program Ecosystem Restoration Program Plan. Implementation Objectives and Targets," dated November 15, 1996.

General Comments:

Ecosystem Restoration is one of several problems which CALFED is charged to solve, for the beneficial use of the Bay-Delta system. As such, the elements of the Ecosystem Restoration Program, as well as other CALFED program elements, need to be consistent with the beneficial uses of the system. The November 15, 1996 document deals only with program actions. A parallel effort should be to identify the beneficial uses of the system, and define the relationship of the program actions to those uses. Then it will be possible to focus the limited resources of the CALFED program on the site-specific implementation projects which provide the greatest benefit and at the same time limit the redirection of impacts to other resources.

Where impacts on agricultural resources are identified, the provisions of CEQA for avoidance, reduction and mitigation of impacts need to be followed. One of the fundamental methods of impact avoidance is alternative site evaluation. The CDFA will continue to work with CALFED to identify impacts, alternatives, and measures to reduce and mitigate unavoidable impacts. To the extent that the program will have unavoidable impacts on agriculture and prime farmland, CALFED program resources need to be allocated to mitigation, in proportion to the magnitude of the impacts.

Specific Comments:

1. Table 1, Page 3 of 5. B. 1. "Increase the amount of high-quality brackish tidal marsh habitats."

Comment: Any action which will increase the volume of the tidal prism has an impact on Delta water quality, salinity in particular. In the Bay-Delta system, tidal flows have a far greater effect than freshwater outflow. This has a large potential to impact a number of the beneficial uses of the system . This needs to be evaluated, and the impacts avoided or mitigated. Delta outflow is so much smaller than the tidal flows that increasing freshwater outflow will probably not be a feasible mitigation for this impact. Since the effects of significant changes in the configuration of the Delta would be very difficult to predict using existing models, early attention should be given

to this potential impact.

2. Table 8, Page 1 of 3.

Comment: Under the first three primary physical processes on this page, the objectives relate to restoration of flows to a semblance of the natural seasonal flow regime. The natural seasonal flow regime of the system is for flows to be lowest during the majority of the dry season. An implication of achieving these objectives is that a greater proportion of the dry water releases from reservoirs upstream of the system may be available for out-of-stream beneficial uses.

3. Table 10, page 3. Exotic species management.

Comment: The CDFA has successful ongoing exotic pest exclusion, detection, eradication, and control programs. Therefor the CDFA is in a unique position to consult with CALFED on the prevention and management of exotic specie invasion. It would be appropriate for CALFED and CDFA to explore and develop a programmatic approach to exotic species. Exotic species raise complex issues, and programs dealing with them need to be established well before detection. While prevention is the ideal goal, resources also need to be allocated for detection and rapid, well planned responses to exotic species detections.